

# Exhibit 6



Daniel Szalkiewicz &lt;daniel@lawdss.com&gt;

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**Re: John Doe v. Baila Sebrow - Case No.: 2:21-cv-20706**

1 message

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**Daniel Szalkiewicz** <daniel@lawdss.com>

Mon, Dec 19, 2022 at 3:11 PM

To: esk\_orders@njd.uscourts.gov

Cc: Ira W Heller &lt;iwhelleresq@gmail.com&gt;

Good afternoon,

Please see attached.

Very Truly Yours,

Daniel S. Szalkiewicz, Esq.

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On Fri, Dec 16, 2022 at 4:05 PM Ira W Heller &lt;iwhelleresq@gmail.com&gt; wrote:

Please find letter attached in regard to the above referenced matter.

Thank you!

Ira W. Heller, Esq.

**IRA HELLER LAW, LLC**

Ira W. Heller, Esq.

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**Reservation of All Rights and Defenses:** Unless specifically set forth to the contrary nothing herein may be

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 **2022.12.19 Letter to Magistrate Kiel.pdf**  
185K

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December 9, 2022

**Via CEF**

United States Magistrate Judge Edward S. Kiel  
Frank R. Lautenberg U.S. Post Office & Courthouse Building  
2 Federal Square  
Newark, NJ 07102

**Re: *John Doe v. Baila Sebrow***  
***United States District Court, District of New Jersey***  
***Case No.: 2:21-cv-20706***

Dear Magistrate Kiel,

We represent the plaintiff in the above-referenced matter. I am in receipt of the defendant's correspondence dated December 16, 2022. While I do not normally litigate by correspondence, I believe it is necessary to address several assertions made by Mr. Heller.

First, at no point did we request that the settlement conference be adjourned. My client looks forward to meeting with the court to discuss the substantive issues.

Second, despite two court orders, Ms. Sebrow still has not provided our office with her initial disclosures. While Mr. Heller states he is not acting in bad faith because he is receiving notices to an older email address, this does not explain why Mr. Heller is ignoring the court orders that I have sent him. On November 1, 2022 I sent him DE 14, on November 11, 2022, I sent him DE 18, and on December 16, 2022 I sent him DE 21. He has still not complied with the orders. It is also clear that Mr. Heller does not have an issue accessing the docket as he filed the answer in this matter.

Third, based on the vast amount of evidence, this is not a frivolous lawsuit and the defendants' inaction in this matter only further harms the plaintiff. Any collateral attacks on my client or our firm are designed to mask Sebrow's bad conduct.

We look forward to discussing this matter further on Wednesday at the settlement conference.

Very Truly Yours,

DANIEL SZALKIEWICZ & ASSOCIATES, P.C.



By: Daniel S. Szalkiewicz, Esq.  
[daniel@lawdss.com](mailto:daniel@lawdss.com)